

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,
Plaintiff

v.

JAMES MARR,
Defendant

Civil Action No: 16-03982

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE

Plaintiff, the United States of America, by its attorneys, hereby responds to the Order to Show Cause entered by the Court on October 27, 2016, why the above captioned case should not be dismissed pursuant to Fed.R.Civ.P. 4(m) for failure to served Defendant, as follows:

1. On July 22, 2016, Plaintiff commenced this action in enforced collections against James Marr.
2. Plaintiff first attempted service at the last known property address, 1533 East Pastrorius Street, Philadelphia, PA 19138, at which time the process server advised per the Defendant's father, the Defendant no longer resides at the property.
3. Plaintiff thereafter made a good faith effort to locate Defendant, including the following: (a) inquiries of postal authorities including inquiries pursuant to the Freedom of Information Act, 39 C.F.R. Part 265, (b) examination of local telephone directories.
4. As a result, Plaintiff instructed its process server to attempt service upon Defendant, James Marr, at his last known addresses indicated by the good faith investigation, namely, 315 Seneca Street, Harrisburg, PA 17110, 1911 Market Street, Harrisburg, PA 17103, 414 Division Street, Apt B, Jeannette, PA 15644, 40 Cuyler Ave, Apt 3, Jeannette, PA 15644 and 2217 Harrison Avenue, Latrobe, PA 15650. Attempts by a private process to serve Defendant at his


last known addresses were unsuccessful.

5. Plaintiff is awaiting copies of the Non Service Affidavits. Upon receipt, Plaintiff will file a Motion for Substitute Service.

WHEREFORE, Plaintiff respectfully requests that the Court's Order to Show Cause be discharged and Plaintiff be allowed to proceed with this case.

Respectfully submitted,

KML Law Group, P.C.

By: 

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CERTIFICATE OF SERVICE

I do hereby certify that service of the foregoing Response and Certificate of Service was made upon:

JAMES MARR
315 Seneca Street
Harrisburg, PA 17110

JAMES MARR
1911 Market Street
Harrisburg, PA 17103

JAMES MARR
414 Division Street, Apt B
Jeannette, PA 15644

JAMES MARR
40 Cuyler Ave Apt 3
Jeannette, PA 15644

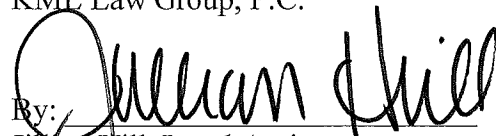
JAMES MARR
2217 Harrison Avenue
Latrobe, PA 15650

JAMES MARR
1533 East Pastrorius Street
Philadelphia, PA 19138

by mailing a true and correct copy thereof, postage prepaid, on this 11st day of November, 2016.

Respectfully submitted,

KML Law Group, P.C.

By: 

Jillian Hill, Legal Assistant
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